

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-11069 (CTG)
)
) (Jointly Administered)
)
) **Re: Docket No. 1712**

AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED ON JANUARY 12, 2024 AT 2:00 P.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE CRAIG T. GOLDBLATT AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Goldblatt's Chambers Procedures <https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl> or on the Court's website at www.deb.uscourts.gov and the Court's website www.deb.uscourts.gov for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements. Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

SALE MOTION MATTER:

1. Motion of the Debtors for Entry of an Order (I)(A) Approving Bidding Procedures for the Sale or Sales of the Debtors' Assets; (B) Scheduling an Auction and Approving the Form and Manner of Notice Thereof; (C) Approving Assumption and Assignment Procedures, (D) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² **Amended items are in bold.**

Contracts and Unexpired Leases; and (III) Granting Related Relief [Filed: 8/7/23] ([Docket No. 22](#))

Sale Objection Deadline: January 5, 2024 at 5:00 p.m. (ET)

Cure/Assumption and Assignment Objections Deadline: November 9, 2023, at 4:00 p.m. (ET)

Cure/Assumption and Assignment Objections Received:

- A. Non-Rolling Stock Assets Cure Objection of Freight Line Properties, LLC [Filed: 10/30/23] ([Docket No. 990](#))
- B. Objection of B & W Investments to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/2/23] ([Docket No. 1025](#))
- C. Objection and Reservation of Rights to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/3/23] ([Docket No. 1033](#))
- D. Objection of Reimer World Properties Corp. and RWP Manitoba Ltd. to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/8/23] ([Docket No. 1063](#))
- E. Objection of MG Fishersville I, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Filed: 11/8/23] ([Docket No. 1071](#))
- F. Objection of 1313 Grand Street Realty, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/8/23] ([Docket No. 1072](#))
- G. Objection of A. Duie Pyle, Inc. to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/8/23] ([Docket No. 1074](#))
- H. Objection of Terreno Clawiter LLC and Terreno Dell LLC to Notice of Potential Assumption or Assignment of Certain Contracts and Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1086](#))
 - i. Exhibit 1 to the Objection of Terreno Clawiter LLC and Terreno Dell LLC to Notice of Potential Assumption or Assignment of Certain Contracts and Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1101](#))

- I. Crown Enterprises, Inc.'s, Crown Enterprises, LLC's, and Dauntless ULC's (A/K/A Crown Enterprises) Objection to Notice of Potential Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1087](#))
- J. Objection of Fazio TV, LLC, Mary A. Fazio Limited Partnership I, and Fazio Faloma Properties LLC To Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1090](#))
- K. Limited Objection of 445 Hollywood Avenue LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1091](#))
- L. Objection of Kestrel Crossdock, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1092](#))
- M. Hawkey Transportation, Inc's Objection to Proposed Cure Amounts in Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1094](#))
 - i. Declaration of Mike Hawkey in Support of Hawkey Transportation, Inc's Objection to Proposed Cure Amounts in Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1097](#))
 - ii. Declaration of Garrett S. Eggen in Support of Hawkey Transportation, Inc's Objection to Proposed Cure Amounts in Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1098](#))
- N. Limited Objection of 181 W. Johnson Holding LLC and 181 W. Johnson Holding II LLC to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1095](#))
- O. Objection of Link Logistics Real Estate Management LLC, BREIT Industrial Canyon GA1B01 LLC, GPT Elkridge Terminal Owner LLC, GPT Deer Park Terminal Owner LLC, and GPT Orlando Terminal Owner LLC, to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1096](#))
 - i. Supplement to Objection of Link Logistics Real Estate Management LLC, BREIT Industrial Canyon GA1B01 LLC, GPT Elkridge Terminal Owner LLC, GPT Deer Park Terminal Owner LLC, and GPT Orlando Terminal

Owner LLC, to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 12/15/23] ([Docket No. 1376](#))

- P. Limited Objections of USHOLL (MI) LLC to Debtors' Notice of Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets Regarding Proposed Cure Amount and Adequate Assurance of Future Performance [Filed: 11/9/23] ([Docket No. 1099](#))
- Q. Objection and Reservation of Rights to Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1100](#))
- R. Objection of MAD Acquisitions, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1103](#))
- S. Response and Reservation of Rights of Exol Properties, L.L.C. and Orange Batavia I LLC to Debtors Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1104](#))
- T. Objection and Reservation of Rights of Fifty Second Avenue Associates, Inc. to the Notice of Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1105](#))
- U. Objection and Reservation of Rights of Creditor Old Republic Insurance Company to Motions for Relief from the Automatic Stay to the Extent of Insurance Proceeds [Filed: 11/9/23] ([Docket No. 1106](#))
- V. Objection of Exeter 1619 N. Plaza, LLC to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1107](#))
- W. Aloha Dwell Wise, LLC, Dwell Wise LP, and Dwell Best, LLC's Limited Objection to Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1108](#))
- X. Objection and Reservation of Rights of Edinburgh Logistics Assets LLC [Filed: 11/9/23] ([Docket No. 1109](#))
- Y. Objection and Reservation of Rights of Finlayson Logistics Assets LLC [Filed: 11/9/23] ([Docket No. 1110](#))
- Z. Objection and Reservation of Rights of M4 Terminals, LLC to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or

Leases Associated With the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1112](#))

- AA. Objection of Southeastern Freight Lines to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1113](#))
- BB. Objection and Reservation of Rights of Prologis USLV SubREIT 2, LLC, Prologis Targeted U.S. Logistics Fund, L.P., Prologis, L.P., DCT Peoria Street LLC, DCT Eck Hoff Street LLC, and Prologis USLV SubREIT 4, LLC to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/9/23] ([Docket No. 1114](#))
- CC. Objection and Reservation of Rights to the Debtors Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 11/16/23] ([Docket No. 1161](#))
- DD. Objection of 1313 Grand Street Realty, LLC to (A) the Proposed Sale Order and Assumption and Assignment of Lease; (B) Cure Costs Proposed in Connection with the Assignment of Lease; and (C) Proposed Adequate Assurance of Future Performance [Filed: 12/8/23] ([Docket No. 1304](#))
- EE. Reservation or Rights Regarding Conduct of Auction [Filed: 12/18/23] ([Docket No. 1397](#))
- FF. Limited Objection of Orange Batavia I LLC to Proposed Assumption and Assignment of Unexpired Real Property Lease [Filed: 1//24] ([Docket No. 1623](#))
- GG. Objection of Southeastern Freight Lines to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets [Filed: 1/8/24] ([Docket No. 1663](#))
- HH. Amended Objection and Reservation of Rights of M4 Terminals, LLC to the Debtors' Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Docket No. 1/9/24] ([Docket No. 1695](#))

Related Documents:

- A. Declaration of Cody Leung Kaldenberg In Support of The Debtors' Motion for Entry of an Order (I)(A) Approving Bidding Procedures for the Sale or Sales of the Debtors' Assets; (B) Scheduling Auctions and Approving the Form and Manner of Notice Thereof; (C) Approving Assumption and Assignment Procedures, (D) Scheduling Sale Hearings and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment

of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [Filed: 9/13/23] ([Docket No. 515](#))

- B. [Signed] Order (I)(A) Approving the Bidding Procedures For the Sale or Sales of the Debtors' Assets, (B) Scheduling Auctions and Approving the Form and Manner of Notice Thereof; (C) Scheduling Sale Hearings and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [Filed: 9/15/23] ([Docket No. 575](#))
- C. Notice of Finalized Bidding Procedures [Filed: 9/18/23] ([Docket No. 601](#))
- D. Notice of Auctions for the Sale of the Debtors' Assets [Filed: 9/20/23] ([Docket No. 621](#))
- E. Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Rolling Stock [Filed: 10/11/23] ([Docket No. 819](#))
- F. Amended Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Rolling Stock [Filed: 10/12/23] ([Docket No. 824](#))
- G. Notice of Rescheduled Bid Deadline, Auction, and Hearing to Approve the Rolling Stock Winning Bidder [Filed: 10/13/23] ([Docket No. 834](#))
- H. Notice of Cancellation of Rolling Stock Bid Deadline and Rolling Stock Auction [Filed: 10/16/23] ([Docket No. 857](#))
- I. Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated With the Non-Rolling Stock Assets [Filed: 10/26/23] ([Docket No. 968](#))
- J. Notice of Auction Progress Relating to Real Property Assets, Including Debtors' Intention to File Notice of Winning Bidders Relating to Certain Real Property Assets By December 5, 2023 [Filed: 12/1/23] ([Docket No. 1261](#))
- K. Notice of Rescheduled Sale Objection Deadline, Adequate Assurance Objection Deadline, and Sale Hearing for Certain of the Debtors' Real Property Assets [Filed: 12/4/23] ([Docket No. 1267](#))
- L. Notice of Winning Bidders and, If Applicable, Back-up Bidders With Respect to Certain of the Debtors' Real Property Assets [Filed: 12/4/23] ([Docket No. 1268](#))
- M. Notice of Adjournment of Real Estate Auction for Certain Remaining Leased Properties to December 18, 2023 at 9:00 a.m. (ET) [Filed: 12/6/23] ([Docket No. 1284](#))

- N. Supplemental Declaration in Support of Cody Leung Kaldenberg in Support of Entry of Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Real Property Assets of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, in Each Case as Applicable Pursuant to the Applicable Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 12/11/23] ([Docket No. 1330](#))
- O. Notice of Winning Bidders With Respect to Certain of the Debtors' Leased Properties [Filed: 12/20/23] ([Docket No. 1403](#))
- P. Notice of Rescheduled Sale Objection Deadline, Adequate Assurance Objection Deadline, and Sale Hearing for Certain of the Debtors' Leased Properties [Filed: 12/20/23] ([Docket No. 1406](#))
- Q. Notice of Filing of Proposed Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Leased Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, in Each Case as Applicable Pursuant to the Applicable Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 12/29/23] ([Docket No. 1540](#))
- R. Notice of Filing of Form of Asset Purchase Agreement Dated as of January 4, 2024 Between the Debtors and Estes Express Lines [Filed: 1/4/24] ([Docket No. 1599](#))
- S. Notice of Filing of Form of Asset Purchase Agreement Between the Debtors and Greenwood Motor Lines, Inc. [Filed: 1/24/24] ([Docket No. 1610](#))
- T. Notice of Filing of Asset Purchase Agreement Dated as of January 5, 2024 Between the Debtors and Greenwood Motor Lines, Inc. [Filed: 1/5/24] ([Docket No. 1625](#))
- U. **Notice of Filing of Asset Purchase Agreement Dated as of December 30, 2023 Between the Debtors and Saia Motor Freight Line, LLC [Filed: 1/2/24] ([Docket No. 1560](#))**
- V. **Notice of Filing of Asset Purchase Agreement Dated as of January 2, 2024 Between the Debtors and ArcBest Property Management, LLC [Filed: 1/2/24] ([Docket No. 1561](#))**
- W. **Notice of Filing of Asset Purchase Agreement Dated as of January 2, 2024 Between the Debtors and FedEx Freight, Inc. [Filed: 1/2/24] ([Docket No. 1562](#))**
- X. **Notice of Filing of Asset Purchase Agreement Dated as of January 2, 2024 Between the Debtors and Knight-Swift Transportation Holdings, Inc. [Filed: 1/3/24] ([Docket No. 1586](#))**

- Y. Declaration of Jon Cremeans in Support of Entry of Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Leased Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, in Each Case as Applicable Pursuant to the Applicable Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 1/11/24] ([Docket No. 1726](#))**

Status: This matter will go forward with respect to the sale of 23 of the Debtors' leased real property assets listed in the notice at Docket No. 1403. The relevant cure/sale objections related to the leased properties being sold are Docket Nos. 1025, 1033, 1092, 1100, 1104, 1114, and 1161. **The Debtors have resolved the objections of B & W Investments [Docket No. 1025], Estes [Docket No. 1033], Kestrel Crossdock, LLC [Docket No. 1092], Montgomery Property [Docket No. 1100], Las Vegas Property [Docket No. 1114], and Sun Valley Property [Docket No. 1114]. The Debtors continue to engage with counsel of the Spokane Property [Docket No. 1100] regarding certain cure amounts, but counsel does not object to entry of the Debtors' requested Sale Order.**

Dated: January 11, 2024
Wilmington, Delaware

/s/ Peter J. Keane

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